

Message

From: Welch, Kara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FC6864409C9149999C3DA1ABA7D8A3D6-WELCH, KARA]
Sent: 9/1/2020 11:29:33 AM
To: Greene, Cheryl [Greene.Cheryl@epa.gov]
CC: Hollis, Linda [Hollis.Linda@epa.gov]; Burnett, Gina [Burnett.Gina@epa.gov]; Bryceland, Andrew [Bryceland.Andrew@epa.gov]; Gonzales, Angela [Gonzales.Angela@epa.gov]
Subject: RE: Do you know where I can find the language that protects birds from treated seeds?
Attachments: acetamiprid_pid.pdf

Hi Cheryl,

I hope you're staying safe and doing well! Remember back in the before times when we used to be cube neighbors? It seems like forever ago!

As for your question about treated seeds and birds, here's a link to the neonic proposed interim decisions (PID) that came out in January 2020:

<https://www.epa.gov/pollinator-protection/proposed-interim-registration-review-decision-neonicotinoids> I've also attached the PID for acetamiprid, of the neonics this one is classified as most highly toxic to birds. In the attached PID, the proposed label language to address protecting birds from treated seeds is below:



acetamiprid_pid....

"Advisory Statements for Acetamiprid Seed Treatment Uses

Acute and chronic dietary risks of concern have been identified for birds and mammals exposed to acetamiprid-treated seeds. The potential for risk depends on the size of the animal and the treated seed. However, the risk potential is also dependent on factors affecting exposure (e.g. application rates, timing, seed depth).

To help mitigate these risks, EPA is proposing that all pesticide products that contain acetamiprid and are registered for seed treatment uses include the following advisory statements:

- "Cover or collect treated seeds spilled during loading and planting in areas (such as in row ends)."
- "Dispose of all excess treated seed by burying seed away from bodies of water."
- "Do not contaminate bodies of water when disposing of planting equipment wash water."

The purpose of these required advisory statements is to encourage the adoption of best management practices when handling and planting acetamiprid-treated seeds that will reduce the exposure of birds and mammals to treated seeds. Covering or collecting spilled seed and burying excess seed are all measures that will reduce the likelihood that animals will find and consume treated seeds. Disposing of excess seeds and equipment wash water away from water bodies, which tend to be gathering points for birds and mammals, decreases the chance of contaminating those water bodies with neonicotinoid residues and the chance that animals will discover and consume treated seeds while visiting a body of water."

All my best!
Kara

From: Greene, Cheryl <Greene.Cheryl@epa.gov>

Sent: Monday, August 31, 2020 9:18 PM

To: Welch, Kara <welch.kara@epa.gov>

Cc: Hollis, Linda <Hollis.Linda@epa.gov>; Burnett, Gina <Burnett.Gina@epa.gov>; Bryceland, Andrew <Bryceland.Andrew@epa.gov>; Gonzales, Angela <Gonzales.Angela@epa.gov>

Subject: Do you know where I can find the language that protects birds from treated seeds?

Importance: High

Hi Kara:

I believe that somewhere around the time that the Agency was going through the neonicotinoid huff, we revised (or perhaps we just threatened to) the language for how to protect birds from treated seeds. It was based on science that demonstrated that the neonics were fatal to birds. Can you recall the language the agency developed or better yet the draft or published document with the language? I'm working on a seed treatment product and need to make sure that the label carries the latest language. Any help you are able to provide will be greatly appreciated.

HOW ARE YOU???

Best regards